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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 15, 2003

Mr. Kevin Leary
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A6-38
Richland, Washington 99352

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EDMC

Dear Mr. Leary:

The Washington State Department of Ecology (Ecology) has reviewed the 216-U-12 Treatment Storage and/or Disposal (TSD) Closure Plan included in the Focused Feasibility Study (FFS) for the U Plant (DOE/RL-2003-23, Draft A). Ecology cannot readily identify the components of the closure plan for evaluation for compliance with Washington Administrative Code 173-303-610. Please extract the required information from the U Plant FFS (and other documents) as appropriate and submit to Ecology as a closure plan for review and approval in accordance with the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Action Plan Sections 5.5 and 6.3. 59727

Although Ecology was unable to review all elements of the closure plan, enclosed please find review comments on elements of an expected closure plan. Ecology notes that the U Plant Area Remediation is the first Area Remediation Project. It is expected that documents applying to the entire Area Remediation (e.g., groundwater monitoring plan and institutional control plan) could be used for 216-U-12 closure/post-closure. However, these potentially useful documents have not yet been developed for the U Plant Area Remediation.

If you have any questions or comments regarding this letter, please contact me at (509) 736-3029 or Alicia Hamar at (509) 736-3032.

Sincerely,

John Price
Environmental Restoration Project Manager
Nuclear Waste Program

JP:AH:nc
Enclosures (2)

cc: (see next page)

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cc: Craig Cameron, EPA
Ellen Mattlin, USDOE
Todd Martin, HAB
Rick Gay, CTUIR
Pat Sobotta, NPT
Russell Jim, YN
Ken Niles, OOE
Administrative Record: 216-U-12

COMMENTS:

Please include the following sections in the closure plan:

1. Introduction:
Provide a description of the site, identify the proposed method of closure, and summarize the contents of each chapter.
2. Facility Description:
Provide a description of the Hanford Site and the location and description of the TSD unit.
3. Process Information:
Describe how the TSD unit managed waste.
4. Waste Characteristics:
Discuss waste inventory and characteristics of the waste treated at the TSD unit.
5. Groundwater Monitoring:
Identify groundwater monitoring requirements and how they will be met.
6. Closure Strategy and Performance Standards:
Discuss steps that will be taken to close the unit.
7. Closure Activities:
Identify activities that will be followed to implement and verify closure. (Including the closure schedule and certification)
8. Post-closure (Surveillance and Maintenance Activities):
Identify post-closure requirements and how they will be met. Include a training plan, inspection plan, and contingency plan.
9. References:
List any references cited in the closure plan.
10. Appendices:
Please include any TPA milestone packages impacting closure activities, compliance schedules, spill information, activities conducted before TSD activities, a summary of non-routine wastes managed or activities conducted, and sampling results.

These comments are not intended to be all-inclusive, but rather a general guide as to what is expected in the 216-U-12 Closure plan.

Index	Section, Page #, Line #	Comment
1.	Section 1.6 Page 1-12 and 1-13 Table 1-2	The USDOE is required to obtain a closure permit per WAC 173-303-800(2) and Post-Closure permit, per WAC 173-303-801(9), if the unit does not meet WAC 173-303-610(2)(b). Table 1-2 does not meet the requirements for content of a closure plan; therefore, a closure plan must be prepared and submitted. With the closure plan application, Ecology requests the permittee submit a completed Environmental Checklist in the format shown in WAC 197-11-960. Please include information about the natural and built environment specific to the U Plant Closure Area, rather than general information about the 200 Areas.
2.	Section 5.2 Page 5-5, Line 32 Page 5-6, Line 2	Alternatives must comply with performance standards set forth in WAC 173-303-610(2). Delete "evaluate ability of alternatives."
3.	Section 5.2 Page 5-6, Line 11-12	Delete "unit will be evaluated through CERCLA criteria" and change to read "Performance standards for the 216-U-12 Crib RCRA TSD shall comply with WAC 173-303-610 (2)."
4.	Section 5.2 Page 5-6, Line 20-22	Reword to encompass "Corrective action performance standards must achieve requirements found in WAC 173-303-646(2)."
5.	Section 5.2 Page 5-6, Line 31-35	Give a detailed explanation of how RCRA corrective action standards are encompassed in the CERCLA criteria. Please clarify sentence lines 32-33. RCRA corrective action performance standards must be met.
6.	Section 5.2.1 Page 5-7, Line 1-13	Please include a detailed description of institutional controls.
7.	Section 5.2.2 Page. 5-7, Line 22-27	Include data to justify that the proposed cap and use of institutional controls are protective of groundwater and will eliminate the impact on the Columbia River. Also, that the proposed cap will prevent direct exposure to dangerous wastes.
8.	Section 5.2.5 Page 5-8, Line 28-29	Please delete "through CERCLA operations and maintenance plan as necessary." Post Closure activities must comply with all Post Closure requirements in WAC 173-303-610(7), (8), (9), and (10)
9.		Please incorporate the appropriate closure and post-closure conditions from Section II of the Site Wide Permit.